
Central Valley Regional Water Quality Control Board

1 September 2016

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ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0550, VICTOR PRODUCE, INC. – PROSECUTION TEAMS TRANSMITTAL OF EVIDENCE

Pursuant to the Hearing Procedure for the above-referenced matter, please find enclosed a list of witnesses the Prosecution Team intends to call at the hearing and a list of evidence with attached exhibits. The Evidence List consists of documents already in the public files of the Central Valley Regional Water Quality Control Board, some of which are being submitted by reference in accordance with the California Code of Regulations, title 23, section 648.3.

The Prosecution Team requests an extension until 9 September 2016 to submit a Declaration from a member of the East San Joaquin Water Quality Coalition. Despite best efforts made by the Prosecution Team to finalize the Declaration prior to the 2 September 2016 deadline, we were unable to do so.

The Prosecution Team has added Terry Bechtel and Wesley Ouimette to the Prosecution Team and witness list to provide additional testimony regarding information about the facility, landowner outreach, and the penalty methodology.

Amended penalty calculations (Attachment C to the Complaint) are also enclosed. This amended attachment updates the farm revenue estimate based on information recently obtained by the Prosecution Team.

If you have any questions regarding the enclosures, please contact Brett Stevens at (916) 464-4642, or via e-mail at brett.stevens@waterboards.ca.gov.

Original signed by

SUE Y. MCCONNELL
Irrigated Lands Program Manager

Enclosures: Amended Attachment C – Calculation of Penalty
Prosecution Team Witness List
Prosecution Team Evidence List & Exhibits

cc via email: Pamela Creedon, Central Valley Water Board, Rancho Cordova
Adam Laputz, Central Valley Water Board, Rancho Cordova
Rob L'Heureux, Central Valley Water Board, Rancho Cordova
Susie Loscutoff, Office of Enforcement, SWRCB, Sacramento
Andrew Deeringer, Office of Chief Counsel, SWRCB, Sacramento
Parry Klassen, East San Joaquin Water Quality Coalition